

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES AND EXCHANGE COMMISSION,**

**Plaintiff,**

**v.**

**NEIL R. COLE and  
SETH HOROWITZ,**

**Defendants.**

**COMPLAINT**

**Civil Action No. 19-CV-11148-JPC  
ECF CASE  
(Jury Trial Demanded)**

**DECLARATION OF SARAH HEATON CONCANNON  
PURSUANT TO LOCAL RULE 1.4**

I, Sarah Heaton Concannon, hereby declare under penalty of perjury pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. I am Senior Trial Counsel at the Securities and Exchange Commission (“SEC”). I submit this declaration in support of my notice of withdrawal as counsel of record to the SEC.
2. The reason for my withdrawal is that I am leaving the SEC, effective September 11, 2021.
3. The SEC will continue to be represented in this matter by Fernando Campoamor Sanchez and Thomas A. Bednar.
4. As reflected in the Court’s February 19, 2020 order, this matter is currently stayed [ECF No. 24].
5. I am not asserting a retaining or charging lien.
6. Accordingly, my withdrawal will not cause any delay or prejudice.

I respectfully request that the Court enter the accompanying Order allowing me to withdraw as counsel of record for Plaintiff.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Sarah Heaton Concannon", with a large, sweeping flourish at the end.

Dated: August 27, 2021  
Washington, D.C.

---

Sarah Heaton Concannon (SC-9111)  
Securities and Exchange Commission  
100 F Street, N.E.  
Washington, D.C. 20549-5977  
Tel: (202) 551-5361  
ConcannonS@sec.gov

**CERTIFICATE OF SERVICE**

I certify that on August 27, 2021, I caused a copy of the foregoing Declaration to be served by ECF on all parties who have made an ECF appearance.

A handwritten signature in black ink, appearing to read "Sarah Heaton Concannon", with a large, sweeping flourish at the end.

---

Sarah Heaton Concannon  
Attorney for Plaintiff  
Securities and Exchange Commission